

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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MRS. UNITED STATES NATIONAL PAGEANT, INC.,

Plaintiff,  
vs.

**DECLARATION OF  
AMY DEMANCHICK**

Case No. 6:18-cv-06587

STEPHANIE L. WILLIAMS, CROWN GARLAND LLC,  
and COSMOS INTERNATIONAL PAGEANTS, INC.

Defendants.

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STATE OF NEW YORK )  
COUNTY OF MONROE ) ss:

**AMY DEMANCHICK** declares under penalty of perjury that:

1. I am a Paralegal employed by Adams Leclair LLP (the “Law Firm”), the attorneys for Plaintiff Mrs. United States Pageant, Inc. I accessed and saved the web pages attached hereto as exhibits Z, AA, BB, CC, DD, EE, FF, and GG, as follows.

**Exhibit Z: Tennessee Facebook Pages**

2. I accessed and saved web pages appearing on Facebook.com referencing pageants in Tennessee, true and correct copies of which are attached as Exhibit Z, as follows:

(A) On July 24, 2018, between 4:45 p.m. and 5:15 p.m. I visited the following Facebook Pages using the internet browser, Google Chrome, on my work computer at Adams Leclair LLP:

- “Tennessee Cosmos Pageants”  
([www.facebook.com/TennesseeCosmosPageants/](http://www.facebook.com/TennesseeCosmosPageants/))

- “Miss Northeast Tennessee Cosmos Pageants”  
([www.facebook.com/Miss-Northeast-Tennessee-Cosmos-Pageants-141813689559871/](http://www.facebook.com/Miss-Northeast-Tennessee-Cosmos-Pageants-141813689559871/))

(B) On July 25, 2018, between 9:55 a.m. and 11:15 a.m. I visited the following Facebook Pages using the internet browser, Google Chrome, on my work computer at Adams Leclair LLP:

- Miss Winterfest United States Pageant (now called “Miss Winterfest Cosmos Pageants” and found at [www.facebook.com/misswinterfestPF/](http://www.facebook.com/misswinterfestPF/)).
- Maryville United States Pageants (now called “East Tennessee Cosmos Pageants” and found at: [www.facebook.com/East-Tennessee-Cosmos-Pageants-193652014542069/](http://www.facebook.com/East-Tennessee-Cosmos-Pageants-193652014542069/)).
- Little Miss & Pre-Teen Tennessee United States (now called “Mini Miss Tennessee Cosmos Pageants” and found at: [www.facebook.com/ MiniMissTNCosmosUnitedStates](http://www.facebook.com/ MiniMissTNCosmosUnitedStates)).
- Miss Teen Tennessee United States (now called “Miss Teen Tennessee Cosmos” and found at: [www.facebook.com/missteennessecosmos/](http://www.facebook.com/missteennessecosmos/)).

(C) On July 31, 2018, between 11:00am and 11:15am I visited the Maryville United States Pageants Facebook Page (now called “East Tennessee Cosmos Pageants” and found at: [www.facebook.com/East-Tennessee-Cosmos-Pageants-193652014542069/](http://www.facebook.com/East-Tennessee-Cosmos-Pageants-193652014542069/)) using the internet browser, Google Chrome, on my work computer at Adams Leclair LLP.

3. At the time that I visited each of the web pages listed in paragraph number 2 above, I saved each page in Portable Document Format (“PDF”) on the Law Firm’s server. True and correct copies of the web pages that I saved as explained in paragraphs 2 and 3 herein are attached to the Declaration of Molly Lewellen as collective **Exhibit Z**.

**Exhibit AA: Video Posted to Tennessee Facebook Page**

4. On August 27, 2018, using the internet browser, Google Chrome, on my work computer at Adams Leclair LLP, I visited the “Tennessee Cosmos Pageants” Facebook page ([www.facebook.com/TennesseeCosmosPageants/](http://www.facebook.com/TennesseeCosmosPageants/)) and downloaded a video posted to the Facebook page (<https://www.facebook.com/TennesseeCosmosPageants/videos/1951147978239027/>). I downloaded the video to the Law Firm’s server at or about 9:40 a.m. A true and accurate excerpt of the video is attached to the Declaration of Molly Lewellen as **Exhibit AA**.

**Exhibit BB: Plaintiff’s Website Domain Names**

5. On August 6, 2018, I typed the following domain names into the internet browser, Google Chrome, on my work computer at Adams Leclair LLP:

- [www.missunitedstatespageants.com](http://www.missunitedstatespageants.com)
- [www.missunitedstatespageant.com](http://www.missunitedstatespageant.com)
- [www.littlemissunitedstatespageant.com](http://www.littlemissunitedstatespageant.com)
- [www.missjriteenunitedstatespageant.com](http://www.missjriteenunitedstatespageant.com)
- [www.misspreteenunitedstatespageant.com](http://www.misspreteenunitedstatespageant.com)
- [www.misssteenunitedstatespageant.com](http://www.misssteenunitedstatespageant.com)
- [www.mswomanunitedstatespageant.com](http://www.mswomanunitedstatespageant.com)
- [www.unitedstatesnationalpageants.com](http://www.unitedstatesnationalpageants.com)
- [www.unitedstatespageants.com](http://www.unitedstatespageants.com)
- [www.unitedstatespageant.com](http://www.unitedstatespageant.com)

6. At the time that I typed each of the domain names listed in paragraph 5 above, I saved each page that appeared in PDF format on the Law Firm’s server.

7. At the time that I typed each of the domain names as stated in paragraph 5 above: the website [www.missunitedstatespageant.com](http://www.missunitedstatespageant.com) contained a farewell message from Crown Garland; the website [www.unitedstatesnationalpageants.com](http://www.unitedstatesnationalpageants.com) redirected to [www.missunitedstatespageant.com](http://www.missunitedstatespageant.com) that contained the same message; and the remaining

web addresses redirected to sites offering to sell the domain names or the domains did not work at all. True and accurate copies of the PDF files that I created when I typed in the domain names as stated in paragraphs 5, 6, and 7 above are attached hereto as collective **Exhibit BB**.

**Exhibit CC: Cosmos Pageants Website**

8. On July 31, 2018, at approximately 2:40 p.m., I visited the web address [www.cosmospageants.com](http://www.cosmospageants.com) using the internet browser, Google Chrome, on my work computer at Adams Leclair LLP, and at that time I saved the website in PDF form to our law firm's server.

9. On August 15, 2018, at approximately 5:20 p.m., I visited the website [www.cosmospageants.com](http://www.cosmospageants.com) again and clicked the "Apply Now" tab on the home page, and at that time I saved this page (<http://www.cosmospageants.com/apply-now/>) as a PDF on the Law Firm's server.

10. On August 17, 2018, at approximately 8:14 a.m., I went back to the same website ([www.cosmospageants.com](http://www.cosmospageants.com)) and clicked on the "Miss Cosmos United States" selection from a "Pageant" dropdown menu on the home page, and at that time I saved this page (<http://www.cosmospageants.com/the-pageant/miss-cosmos-united-states-pageant/>) as a PDF on the Law Firm's server. True and accurate copies of the PDFs that I saved as explained in paragraph 8, 9, and 10 herein are attached hereto as collective **Exhibit CC**.

**Exhibit DD: Miss Arnold Fitness Website**

11. On August 2, 2018, using the internet browser, Google Chrome, on my work computer at Adams Leclair LLP, I visited the Miss Arnold Fitness Pageant website ([www.arnoldpageant.com](http://www.arnoldpageant.com)). At that time, I clicked on a link to a November 20, 2017 press

release that described Stephanie Williams' role with the Arnold Pageant company. At that time, I saved an image of this page ([www.arnoldpageant.com/index.php/2017/11/20/stephi-williams-named-national-director/](http://www.arnoldpageant.com/index.php/2017/11/20/stephi-williams-named-national-director/)) as a PDF on the Law Firm's server. A true and accurate copy of the PDF that I saved as explained in this paragraph is attached hereto as **Exhibit DD**.

**Exhibit EE: Twitter and Instagram**

12. On August 23, 2018, at approximately 11:25 a.m., using the internet browser, Google Chrome, on my work computer at Adams Leclair LLP, I visited the Miss Tennessee Cosmos United States Twitter Feed (@MissTnCosmosOrg) via the web address [www.twitter.com/MissTnCosmosOrg](http://www.twitter.com/MissTnCosmosOrg). At that time, I saved an image of this page to the Law Firm's server in PDF format. At approximately the same time, I visited the Tennessee Cosmos Pageants (@misstncosmosorg) Instagram feed via the web address <https://www.instagram.com/misstncosmosorg/>, and at that time I also saved an image of the Instagram page to the Law Firm's server in PDF format. True and accurate excerpts of the PDFs I saved of these Twitter and Instagram feeds are attached as collective **Exhibit EE**.

**Exhibit FF: Additional Facebook Posts and Web Pages**

13. On July 23, 2018, between approximately 4:45 p.m. and 5:00 p.m., I visited the following Facebook Pages using the internet browser, Google Chrome, on my work computer at Adams Leclair LLP:

- Ms. Woman North Carolina United States ([www.facebook.com/Ms-Woman-North-Carolina-United-States-407920716303360](http://www.facebook.com/Ms-Woman-North-Carolina-United-States-407920716303360))
- Miss Teen NC Cosmos United States ([www.facebook.com/pg/Miss-Teen-NC-Cosmos-United-States-241819252926818/about?ref=page\\_internal](http://www.facebook.com/pg/Miss-Teen-NC-Cosmos-United-States-241819252926818/about?ref=page_internal))

- Miss NC Cosmos Organization (<https://www.facebook.com/Miss-NC-Cosmos-Organization-784611128323757/>)

These pages contained references to the Mrs. United States pageants and organization.

14. On July 24, 2018, at approximately 10:40 a.m., I visited the Facebook page of Sharon Harkey McInnis, who identifies herself as a “Director” at “NC and SC Miss Cosmos United States Pageant” (<https://www.facebook.com/sharon.h.mcinnis>). That page included a post dated July 19, 2018, referencing “Cosmos International Pageants”, and a comment by an individual asking whether this pageant “took the place of Miss United States?”

15. On July 31, 2018, at approximately 4:54 p.m., I visited [www.missfloridaunitedstates.com](http://www.missfloridaunitedstates.com) using the internet browser, Google Chrome, on my work computer at Adams Leclair LLP. I observed an advertisement for “Miss Arnold Teen Fitness Pageant” and “Cosmos International Pageants”.

16. On July 31, 2018, between 10:50 a.m. and 12:00 p.m., I visited the following Facebook Pages using the internet browser, Google Chrome, on my work computer at Adams Leclair LLP:

- “Mini Miss NC Cosmos United States” ([https://www.facebook.com/pg/Mini-Miss-NC-Cosmos-United-States-1174117159373149/about/?ref=page\\_internal](https://www.facebook.com/pg/Mini-Miss-NC-Cosmos-United-States-1174117159373149/about/?ref=page_internal))
- “Jr Miss NC Cosmos United States” ([https://www.facebook.com/pg/Jr-Miss-NC-Cosmos-United-States-1566676846695562/about/?ref=page\\_internal](https://www.facebook.com/pg/Jr-Miss-NC-Cosmos-United-States-1566676846695562/about/?ref=page_internal))
- “Miss Teen SC Cosmos United States” ([https://www.facebook.com/pg/missteenSCcosmos/about/?ref=page\\_internal](https://www.facebook.com/pg/missteenSCcosmos/about/?ref=page_internal))

17. On August 9, 2018 at approximately 2:23 p.m., I visited the “Florida Cosmos

United States Pageants" Facebook page at:

[www.facebook.com/FloridaCosmosUSPageants](http://www.facebook.com/FloridaCosmosUSPageants). I observed a photo posted to the timeline advertising Cosmos Pageants that stated "New Name. Same Director. Same Commitment to Volunteer Service."

18. On August 16, 2018, at approximately 3:54 p.m., I visited the Crown Garland LLC Facebook page using the internet browser, Google Chrome, on my work computer at Adams Leclair LLP at [www.facebook.com/CrownGarlandLLC](http://www.facebook.com/CrownGarlandLLC). I observed a post made by Stephi Barton Williams advertising the 2019 Miss Cosmos International Pageant and a comment by an individual who asked, "Is this still a United States Affiliation?"

19. At the dates and times listed in paragraphs 13 through 18 herein, I saved the referenced Facebook pages and websites that I observed in PDF format to the Law Firm's server. True and accurate copies of the PDFs that I saved are attached hereto as collective **Exhibit FF**.

**Exhibit GG: Google Search Result Lists**

20. On August 16, 2018, between approximately 11:00 a.m. and 12:00 p.m., I entered several Google searches into the Google Chrome internet browser on my work computer at Adams Leclair LLP, and at that time I saved the search result lists in PDF format on the Law Firm's server. True and accurate copies of the PDFs that I saved of the Google search result lists referenced in this paragraph are attached hereto as collective **Exhibit GG**.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 10, 2021

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s/ Amy Demanchick  
AMY DEMANCHICK